

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

AEROSTAR AIRPORT HOLDINGS, LLC

Plaintiff,

v.

AAA CAR RENTAL, INC. et al.

Defendants.

Civil No.: 15-1959 (FAB)

**JOINT MOTION FOR VOLUNTARY DISMISSAL OF CLAIMS
AGAINST AMERICAN CAR AND TRUCK RENTAL, INC.**

TO THE HONORABLE COURT:

COME NOW Aerostar Airport Holdings, LLC. (“Aerostar”), and codefendant American Car and Truck Rental, Inc. (“American Car”), and through their respective undersigned attorneys, respectfully state and pray as follows:

1. Aerostar and American Car have executed a confidential Settlement Agreement and Release whereby they have agreed *inter alia*, to the voluntary dismissal with prejudice of Aerostar’s claims against American Car.
2. Accordingly, Aerostar and American Car hereby move the Court pursuant to Fed.R.Civ.P. 41(a)(2), for an order approving the dismissal of the claims in the Amended Verified Complaint as against American Car, with prejudice, and without the imposition of costs, interest, or attorney’s fees.
3. Aerostar and the appearing codefendants specifically request that the Court in its order expressly incorporate by reference the terms of the appearing parties’ confidential Settlement Agreement and Release and state that it will retain jurisdiction to enforce the terms of that Agreement pursuant to Kokkonen v. Guardian Life Insurance Co., 511 U.S. 375 (1994).

4. To that end, Aerostar is on this same date separately filing a motion to restrict access to the appearing parties' confidential Settlement Agreement and Release, and submitting the document itself via separate motion as well.
5. It is the intention of Aerostar to continue to prosecute the claims in its Amended Verified Complaint against all other codefendants.

RESPECTFULLY SUBMITTED.

I CERTIFY that today I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.

In San Juan, Puerto Rico this 14th day of January, 2016.

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